ROBERT J. HOOY, ESQ., SB #118074 WILLIAM J. HOOY, ESQ. SB #300189 HOOY & HOOY, a Professional Law Corporation 3125 Clayton Road, Second Floor 3 Concord, California 94519 Tel: (925) 798-0426 Fax: (925) 798-0458 rhooy@hooy.com whooy@hooy.com 6 Attorneys for Defendant 7 FOUR CORNERS AUTOMOTIVE SERVICE, INC., d/b/a FOUR 8 **CORNERS UNION 76** 9 UNITED STATES DISTRICT COURT NORTHER DISTRICT OF CALIFORNIA 10 11 JOHN RODGERS. No. 4:17-CV-6862 KAW 12 Plaintiff, STIPULATION REQUESTING 13 EXTENSION OF TIME OF DEFENDANT 14 TO RESPOND TO PLAINTIFF'S VS. COMPLAINT AND THE PARTIES' 15 FOUR CORNERS AUTOMOTIVE INITIAL DISCLOSURES (CIVIL L.R. 6-2); SERVICE, INC., d/b/a FOUR CORNERS (PROPOSED) ORDER AS MODIFIED 16 UNION 76, AND DOES 1-10, INCLUSIVE; 17 18 Defendants. 19 20 Pursuant to Civil Local Rule 6-2(a) of the Local Rules of Practice in Civil Proceedings 21 before the United States District Court for the Northern District of California, and the Federal 22 Rules of Civil Procedure, the undersigned on behalf of the parties indicated hereby stipulate 23 and agree to the herein request that the court enter an order extending the time of defendant, FOUR CORNERS AUTOMOTIVE SERVICE, INC., d/b/a FOUR CORNERS UNION 76, to 24 file its response to the complaint of plaintiff JOHN RODGERS and the parties' time to complete initial disclosures (General Order 56¶2) from March 14, 2018 to April 16, 2018. 26 Good cause exists for the requested extensions. Pursuant to Civil L.R. 6-1, the parties 27 stipulated to extend defendant's time to respond to March 14, 2018; this was and is the only 28 STIPLULATION REQUESTING EXTENSION OF 1 TIME OF DEFENDANT TO RESPOND TO PLAINTIFF'S COMPLAINT AND THE PARTIES' INITIAL DISCLOSURES (CIVIL L.R. 6-2)

(PROPOSED) ORDER

extension sought or granted in the case. In making the original stipulation, the parties expected they would have ample time to conduct a joint site inspection and settle the case or afford defendant time to file its responsive pleading. The parties scheduled a joint site inspection for March 2, 2018. From defendant's perspective, its primary purpose for the joint site inspection was to demonstrate to plaintiff's counsel that defendant completed all repairs it identified in the CASp inspection and report it provided to plaintiff. Understandably, plaintiff's counsel and experts want to personally view the changes and ensure that no disability access barriers remain. However, at plaintiff's request and due to an availability problem of the plaintiff's expert, the parties cancelled the inspection. Defendant's counsel then contracted the flu, which deferred the setting of a new joint site inspection date, among other things. The parties now have scheduled the case for the joint site inspection on March 22, 2018. Under the Court's Scheduling Order for this case, the last day to complete the joint site inspection will be March 14, 2018; the initial disclosures were due March 7, 2018. The parties assert that the requested extension of time should be sufficient to either allow the parties to resolve the case or allow defendant adequate time to file its responsive pleading and complete the initial disclosures.

Dated: March 12, 2018 HOOY & HOOY A Professional Law Corporation

/s/ Robert J. Hooy

ROBERT J. HOOY, ESQ., Attorney for defendant FOUR CORNERS AUTOMOTIVE SERVICE, INC., d/b/a FOUR CORNERS UNION 76

Dated: March 12, 2018 ALLACCESS LAW GROUP

/s/ Irene Karbelashvili

IRENE KARBELASHVILI, ESQ., attorney for plaintiff JOHN RODGERS

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## **ORDER AS MODIFIED**

The parties having so stipulated and good cause appearing;

**IT IS HEREBY ORDERED** that the deadline for Defendant to file an Answer and the parties to complete initial disclosures and the joint site inspection is April 16, 2018, with all dates triggered by that deadline continued accordingly.

8 Dated: <u>3/14/18</u>

IT IS SO ORDERED.

STIPLULATION REQUESTING EXTENSION OF TIME OF DEFENDANT TO RESPOND TO PLAINTIFF'S COMPLAINT AND THE PARTIES' INITIAL DISCLOSURES (CIVIL L.R. 6-2) (PROPOSED) ORDER

## DECLARATION OF E-FILED SIGNATURE

file this STIPULATION REQUESTING EXTENSION OF TIME OF DEFENDANT TO

DISCLOSURES (CIVIL L.R. 6-2) (PROPOSED) ORDER, In compliance with Civil Local

Rule 5-1(i)(1), (3) of this Court, I hereby declare that IRENE KARBELASHVILI, ESQ.

TO PLAINTIFF'S COMPLAINT

has read and approved this Stipulation and consents to its filing in this action.

I, Robert J. Hooy, Esq., am the ECF User whose ID and Password are being used to

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RESPOND

Dated: March 12, 2018

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STIPLULATION REQUESTING EXTENSION OF TIME OF DEFENDANT TO RESPOND TO PLAINTIFF'S COMPLAINT AND THE PARTIES' INITIAL DISCLOSURES (CIVIL L.R. 6-2) (PROPOSED) ORDER

**HOOY & HOOY** 

A Professional Law Corporation

AND

THE

PARTIES'

/s/ Robert J. Hooy

ROBERT J. HOOY, ESQ., Attorney for defendant FOUR CORNERS AUTOMOTIVE SERVICE, INC., d/b/a FOUR CORNERS UNION 76

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